From: PETERSON Jenn L

Eric Blischke/R10/USEPA/US@EPA To:

Subject: RE: Hit/No Hit Criteria Date: 06/09/2008 10:55 AM

Attachments: PredBenthicModelDirectionMemo122205.doc

PredBenthicModelDirectionMemo102005.doc PredBenthicModelDirectionMemo102605.doc Summary of Nov21 Benthic Mgt JP comments.doc 2006-03-17 DRAFT BENTHICINTERPRETATIVE TEXT.pdf

Eric,

Here are EPA's memos stating we wanted the 10, 20, 30. I am sure you have these, so sorry if there is duplication. There was a LWG memo the I provided comments on (embedded in the memo) - I couldn't find the I provided comments on (embedded in the memo) - I couldn't find the original but my comments are in blue so you can see what the LWG originally proposed. Agreements from this memo turned into the LWG document "Draft Benthic Interpretive Text" shows the new hits criteria framework outlined. I think the new document is on the Portal, but I haven't gone to find it. The alternative is that the "Benthic Interpretive Approach" report was wrapped into the PRE or Round 2 Report and not finalized. Our justification for going to the new "bins" was to provide consistency between the LRM and the FPM in terms of showing magnitude for the evaluation. That way we were looking at an "apple to apple" comparison between the models.

-Jennifer

----Original Message---From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Friday, June 06, 2008 9:10 AM
To: PETERSON Jenn L
Subject: Hit/No Hit Criteria

Jennifer, it seems like we have been discussing this topic for some time. At this point, we need to come to resolution quickly. I went back to the March 18, 2005 document "Estimating Risks to Benthic Organisms Using Sediment Toxicity Tests." This document was approved by EPA. In this document, the LWG proposed a minor effect level based on a 10% difference for the two mortality endpoints, a 25% difference for the Hyalella growth endpoint and a 20% difference for the Chironomus growth endpoint. For moderate to severe effects, the LWG proposed a 25% difference for the two mortality endpoints. Hyalella growth endpoint and a 20% difference for the Chironomus growth endpoint. For moderate to severe effects, the LWG proposed a 25% difference for the two mortality endpoints, a 40% difference for the Hyalella growth endpoint and a 30% difference for the Chironomus growth endpoint. Only two levels of effect were presented consistent with Washington DOE SQS and CSL standards. They also proposed a pooled endpoint criteria.

What is unclear to me is why we deviated from this approved approach. Do you know the history of this? Do you recall where the 10%, 20% and 30% framework first showed up? The first place I recall seeing it was in the mapping that NOAA performed last year to support our identification of Round 3B data gaps. I also found in my files a powerpoint presentation from July 2005 in which the LWG presented some different hit/no hit criteria.

Any ideas?

Eric